AUG 02 2018

U.S. MAGISTRATE JUDGE

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 3:18 PD 543-MLC

RAYMOND T. REINKE,

Defendant.

## PETITION TO REVOKE BOND

Defendant was charged with 36 C.F.R. § 2.32(a)(1), interference; 36 C.F.R. § 2.35(c), under the influence of alcohol to a degree that endangers self or others; and 36 C.F.R. § 2.34(a)(3), disorderly conduct. Defendant was placed on bond on July 28th, 2018, with conditions, inter alia, that the defendant obey all federal, state, and local laws and that the defendant not use nor possess any alcohol or other controlled substances.

On July 31st, 2018, REINKE and his traveling companion, Ted WYRICK, were stopped in Lake Village at approximately 2:45 PM MDT by U.S. Park Rangers. REINKE was a passenger in the vehicle and received a violation notice for not wearing a seatbelt. Rangers noted that REINKE appeared to be intoxicated and was argumentative. Rangers were unaware of REINKE's bond conditions.

At approximately 8:10 PM MDT, Yellowstone National Park visitors reported that REINKE was harassing and herding bison in Lamar Valley. A video taken by visitors shows a man, identified as REINKE by Rangers, shouting at and approaching a bison. The bison is within twenty feet of REINKE at all times. The bison charged REINKE twice as a result of his harassment. Rangers contacted REINKE near the Tower area and issued two violation notices to REINKE: one for open container and one for harassing wildlife. Rangers issued REINKE's traveling companion, WYRICK, a violation notice for possession of a controlled substance. Again, Rangers were unaware of REINKE's bond conditions.

Defendant has violated the conditions of his bond by approaching and harassing wildlife and by using and possessing alcohol and the United States petitions the Court to revoke his bond. The United States requests that the Court issue a warrant for the defendant's arrest.

DATED this 2d day of August, 2018.

Respectfully submitted,

MARK A. KLAASSEN United States Attorney

By:

Assistant United States Attorney